

**PART 70 OPERATING PERMIT  
and ENHANCED NEW SOURCE REVIEW  
OFFICE OF AIR MANAGEMENT**

**Front Line Manufacturing, Inc.  
306 School Street  
Leesburg, Indiana 46538**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T085-7186-00070	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a plastic composite manufacturing plant.

Responsible Official: Ray Doss  
Source Address: 306 School Street, Leesburg, Indiana, 46538  
Mailing Address: P.O. Box 176, Leesburg, Indiana, 46538  
SIC Code: 3714  
County Location: Kosciusko County  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Minor Source, under PSD;  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) Glasscraft Model No. LPA2-100, Gel Spray Gun, identified as Emission Unit (EU) ID AA, rated at 148 pounds per hour, and exhausting to one stack identified as S/V ID C, installed in 1995;
- (2) Two (2) Glasscraft Model No. LPA2-100, Chop Spray Guns, identified as EU BB and CC, each rated at 523 pounds per hour, and exhausting to two (2) stacks identified as S/V ID A and B, installed in 1995; and
- (3) Three (3) Circular Saws (one Chicago Pneumatic and two Makitas), identified as EU EE, DD and FF, each rated at 231 pounds per hour, and all exhausting to one (1) stack identified as S/V ID D, installed in 1995.

### A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (4) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

### A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).

**B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]**

- |            |   |
|------------|---|
| (a)        | Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7. |
| (b)        | This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."   |
| <b>B.2</b> | <b>Definitions [326 IAC 2-7-1]</b>  |
|            | Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.  |
| <b>B.3</b> | <b>Permit Term [326 IAC 2-7-5(2)]</b>   |
|            | This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.   |
| <b>B.4</b> | <b>Enforceability [326 IAC 2-7-7(a)]</b>  |
| (a)        | All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.  |
| (b)        | Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.   |
| <b>B.5</b> | <b>Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]</b>  |
|            | The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).  |
| <b>B.6</b> | <b>Severability [326 IAC 2-7-5(5)]</b>  |
|            | The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.   |
| <b>B.7</b> | <b>Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]</b>   |
|            | This permit does not convey any property rights of any sort, or any exclusive privilege.  |
| <b>B.8</b> | <b>Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]</b>  |
| (a)        | The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:   |

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

**B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]**

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- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

**B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]**

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- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was based on continuous or intermittent data;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
  - (5) Any insignificant activity that has been added without a permit revision; and
  - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]**  
**[326 IAC 1-6-3]**

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:



Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

**B.13 Emergency Provisions [326 IAC 2-7-16]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management,  
Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.14 Permit Shield [326 IAC 2-7-15]**

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- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
  - (1) The applicable requirements are included and specifically identified in this permit; or
  - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

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Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

**B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) An emergency as defined in 326 IAC 2-7-1(12); or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
  - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:

- (1) That this permit contains a material mistake.
- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.18 Permit Renewal [326 IAC 2-7-4]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]
  - (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]**

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]**

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The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of

the change.

- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

**B.22 Operational Flexibility [326 IAC 2-7-20]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;

- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.23 Construction Permit Requirement [326 IAC 2]**

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Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

**B.24 Inspection and Entry [326 IAC 2-7-6(2)]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.  
[326 IAC 2-7-6(6)]



- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
- (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

**B.25** Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]  
Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM, shall reserve the right to issue a new permit.

**B.26** Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

**B.27** Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source
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### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit VOC is limited to less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAM prior to making the change.

#### C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

#### C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

#### C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

#### C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

**C.7 Operation of Equipment [326 IAC 2-7-6(6)]**

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All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation and exhausting to the atmosphere.

**C.8 Stack Height [326 IAC 1-7]**

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- (a) The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

**C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]**

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
- (A) Asbestos removal or demolition start date;
- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

### **Testing Requirements [326 IAC 2-7-6(1)]**

#### **C.10 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.  
  
A test protocol, except as provided elsewhere in this permit, shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.
- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

#### **C.11 Compliance Schedule [326 IAC 2-7-6(3)]**

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The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

**C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**C.13 Monitoring Methods [326 IAC 3]**

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Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

- (f) Upon direct notification by IDEM, OAM that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
  - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
  - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
  - (3) A verification to IDEM, OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Compliance Monitoring Plan - Failure to Take Response Steps 326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

- (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

##### **C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.

##### **C.19 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]**

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.



- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

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- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;

- (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## Stratospheric Ozone Protection

### C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (1) One (1) Glasscraft Model No. LPA2-100, Gel Spray Gun, identified as Emission Unit (EU) ID AA, rated at 148 pounds per hour, and exhausting to one stack identified as S/V ID C, installed in 1995;
- (2) Two (2) Glasscraft Model No. LPA2-100, Chop Spray Guns, identified as EU BB and CC, each rated at 523 pounds per hour, and exhausting to two (2) stacks identified as S/V ID A and B, installed in 1995.

## Emission Limitations and Standards [326 IAC 2-7-5(1)]

### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to the Best Available Control Technology (BACT) analysis presented as part of this application:

- (a) This facility shall use less than 725.5 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This usage limit is required to limit the sourcewide potential to emit of VOC to less than 197.1 tons per year to maintain compliance with 326 IAC 8-1-6 (Volatile Organic Compounds).
- (b) the following work practices have been determined to be BACT for the three (3) spray guns:
  - (1) training and instruction of operators in the most effective work practices for controlling placement of the gel coat including correctly positioning gun nozzles to maintain a 90° angle to the mold surface;
  - (2) proper testing of spray guns prior to daily use;
  - (3) proper equipment clean-up and maintenance;

- (4) all resins and gelcoats will be applied with air assisted airless spray applicators;
  - (5) spray cleaners will be cleaned with acetone;
  - (6) cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly;
  - (7) the spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air;
  - (8) the overspray shall be minimized by spraying as close as practical into the molds;
  - (9) the application equipment operators shall be instructed and trained on the methods and practices utilized to minimize the overspray emitted on the floor and into the air filters;
  - (10) all solvent sprayed during cleanup or color changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized; and
  - (11) storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.
- (c) The allowable VOC emissions from the gel coat spray gun (EU AA) will be 6.4 tons per month, based on 14.7% flash off for non vapor suppressed (NVS) gel coat. The allowable VOC emissions from the resin chop spray guns (EU BB and CC) will be 10.03 tons per month, based on 7.0% flash off for non vapor suppressed (NVS) resin.
- The BACT analysis and emissions calculations were based on:
- (1) The gel coating used had a styrene concentration of 33% or less and a flash off of 14.7%.
  - (2) The resin coating used had a styrene concentration of 35% or less and a flash off of 7.0%
  - (3) The mold release coating had a VOC concentration of 98% or less.
  - (4) The catalyst used had a VOC concentration of 49% or less.
- (d) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for a each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.
- (e) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.

**D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]**

The PM from the three (3) spray guns (EU AA, BB and CC) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

**D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

**Compliance Determination Requirements**

**D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)]**

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 and the PM limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**D.1.5 Volatile Organic Compounds (VOC)**

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.1.6 Particulate Matter (PM)**

The dry filters used for PM control shall be in operation at all times when the three (3) spray guns (EU AA, BB or CC) are in operation and exhausting to the atmosphere.

**D.1.7 Monitoring**

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack S/V ID C while one or more of the booths are in operation and exhausting to the atmosphere. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed.

The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

### **Record Keeping Requirements [326 IAC 2-7-5(3)]**

#### **D.1.8 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.1 and/or D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1 and/or D.1.2.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The volume weighted VOC content of the coatings used for each month;
  - (4) The cleanup solvent usage for each month;
  - (5) The total VOC usage for each month; and
  - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.6 and D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.1.9 Reporting Requirements**

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A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (3) Three (3) Circular Saws (one Chicago Pneumatic and two Makitas), identified as EU EE, DD and FF, each rated at 231 pounds per hour, and all exhausting to one (1) stack identified as S/V ID D, installed in 1995.

## Emission Limitations and Standards [326 IAC 2-7-5(1)]

### D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the each circular saw facility shall not exceed 0.363 pounds per hour when operating at a process weight rate of 229 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

## Compliance Determination Requirements

### D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

## Record Keeping Requirement [326 IAC 2-7-5(3)]

### D.2.3 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records of daily visible emission notations of the circular saws stack exhaust.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.3

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (4) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

**Boilers      Natural Gas-fired Boilers less than 10 mmBtu/hr**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

**D.3.1    Particulate Matter (PM)**

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Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from the natural gas combustion sources with a heat input equal to or less than 10 mmBtu/hr shall be limited to 0.6 pounds per mmBtu heat input.

**Compliance Determination Requirement**

**D.3.2    Testing Requirements [326 IAC 2-7-6(1),(6)]**

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The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Front Line Manufacturing, Inc.  
Source Address: 306 School Street, Leesburg, IN 46538  
Mailing Address: P.O. Box 176, Leesburg, IN 46538  
Part 70 Permit No.: T085-7186-00070

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- ☐ Annual Compliance Certification Letter
- ☐ Test Result (specify) \_\_\_\_\_
- ☐ Report (specify) \_\_\_\_\_
- ☐ Notification (specify) \_\_\_\_\_
- ☐ Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5967  
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT  
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Front Line Manufacturing, Inc.  
Source Address: 306 School Street, Leesburg, IN 46538  
Mailing Address: P.O. Box 176, Leesburg, IN 46538  
Part 70 Permit No.: T085-7186-00070

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2	
9 1.	This is an emergency as defined in 326 IAC 2-7-1(12) <input type="checkbox"/> The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and <input type="checkbox"/> The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(c) <input type="checkbox"/> The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation?      Y      N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Front Line Manufacturing, Inc.  
Source Address: 306 School Street, Leesburg, IN 46538  
Mailing Address: P.O. Box 176, Leesburg, IN 46538  
Part 70 Permit No.: T085-7186-00070  
Facility: Source-wide  
Parameter: VOC Emissions  
Limit: This facility shall use less than 725.5 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This usage limit is required to limit the sourcewide potential to emit of VOC to less than 197.1 tons per year to maintain compliance with 326 IAC 8-1-6 (Volatile Organic Compounds).

YEAR: \_\_\_\_\_

Month	VOC Emissions (tons)	VOC Emissions (tons)	VOC Emissions (tons/year)
	This month	Previous 11 months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on:

Submitted by:  
Title / Position:  
Signature:  
Date:  
Phone:

**INDIANA DEPARTMENT OF ENVIRONMENTAL  
MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Front Line Manufacturing, Inc.  
Source Address: 306 School Street, Leesburg, IN 46538  
Mailing Address: P.O. Box 176, Leesburg, IN 46538  
Part 70 Permit No.: T085-7186-00070

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD**

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

<b>Compliance Monitoring Requirement</b> (e.g. Permit Condition D.1.3)	<b>Number of Deviations</b>	<b>Date of each Deviation</b>

Form Completed By: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management  
Office of Air Management**

**Technical Support Document (TSD) for a Part 70 Operating Permit  
and Enhanced New Source Review (ENSR)**

**Source Background and Description**

<b>Source Name:</b>	<b>Front Line Manufacturing, Inc.</b>
<b>Source Location:</b>	<b>306 School Street, Leesburg, IN 46538</b>
<b>County:</b>	<b>Kosciusko</b>
<b>SIC Code:</b>	<b>3714</b>
<b>Operation Permit No.:</b>	<b>T085-7186-00070</b>
<b>Permit Reviewer:</b>	<b>Richard A. Moore Jr./EVP</b>

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Front Line Manufacturing relating to the operation of a plastic composite manufacturer plant.

**Permitted Emission Units and Pollution Control Equipment**

There are no permitted facilities operating at this source during this review process.

**Unpermitted Emission Units and Pollution Control Equipment**

The source consists of the following unpermitted facilities/units:

- (1) One (1) Glasscraft Model No. LPA2-100, Gel Spray Gun, identified as Emission Unit (EU) ID AA, rated at 148 pounds per hour, and exhausting to one stack identified as S/V ID C, installed in 1995;
- (2) Two (2) Glasscraft Model No. LPA2-100, Chop Spray Guns, identified as EU BB and CC, each rated at 523 pounds per hour, and exhausting to two (2) stacks identified as S/V ID A and B, installed in 1995; and
- (3) Three (3) Circular Saws (one Chicago Pneumatic and two Makitas), identified as EU EE, DD and FF, each rated at 231 pounds per hour, and all exhausting to one (1) stack identified as S/V ID D, installed in 1995.

**Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)**

The three (3) unpermitted emission units listed above are to be reviewed under the ENSR process within the Title V review process for this permit.

**Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

### Enforcement Issue

- (a) IDEM is aware that the all the equipment has been constructed and/or operated prior to receipt of the proper permit:
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit, which includes the enhanced new source review (ENSR) for all unpermitted facilities, is intended to satisfy the requirements of both the construction permit rules and the Part 70 rules.

### Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on November 15, 1996. Additional information was received on November 20, 1996, December 2, 1996, December 16, 1996, and October 29, 1997.

A notice of completeness letter was mailed to Front Line Manufacturing, Inc. on January 24, 1997.

### Emission Calculations

See Appendix A of this document for detailed emissions calculations on pages 1 through 3.

### Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	greater than 100 and less than 250
PM-10	greater than 100 and less than 250
SO <sub>2</sub>	less than 100
VOC	greater than 100 and less than 250
CO	less than 100
NO <sub>x</sub>	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Styrene	greater than 10
Methyl Ethyl Ketone	less than 10
Toluene	less than 10
Dimethyl Phthalate	less than 10
TOTAL	greater than 25

- (a) The potential emissions (as defined in the Indiana Rule) of PM-10 and VOCs are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### Actual Emissions

The following table shows the actual emissions from the source. This information reflects data supplied by the applicant in their Part 70 application.

Pollutant	Actual Emissions (tons/year)
PM	7.27
PM-10	3.33
SO <sub>2</sub>	0
VOC	36.57
CO	0
HAP - Styrene	35.91
HAP - Methyl Ethyl Ketone	0.23
HAP - Toluene	0.38
NO <sub>x</sub>	0

### Limited Potential to Emit

The table below summarizes the total limited potential to emit of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/ facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
EU AA	2.15	2.15	NA	76.73	NA	NA	76.66
EU BB & CC	8.5	8.5	NA	120.32	NA	NA	110.30
EU DD, EE, FF	4.78	0.84	NA	NA	NA	NA	NA
Insig. Natural Gas combustion	0.52	0.52	0.03	0.25	0.91	4.34	NA
Total Emissions	15.95	12.01	0.03	197.30	0.91	4.34	186.96

Attached Tables A and B summarize the permit conditions and requirements



### County Attainment Status

The source is located in Kosciusko County.

Pollutant	Status
TSP	attainment
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Kosciusko County has been designated as attainment or unclassifiable for ozone.

### Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (1) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (2) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

### Federal Rule Applicability

- (1) There are no New Source Performance Standards ([326 IAC 12] [40 CFR Part 60]) applicable to this source.
- (2) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (40 CFR Part 63) applicable to this source.

### State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration, PSD) and 40 CFR 52.21

This source is not subject to the requirements of 326 IAC 2-2 (PSD), because the source is not one of the 28 listed source categories and the source's potential emissions for all regulated pollutants are less than 250 tons per year.

**326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOCs. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

**326 IAC 5-1 (Visible Emissions Limitations)**

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

**326 IAC 6-4 (Fugitive Dust Emissions)**

This source is subject to 326 IAC 6-4 for fugitive dust emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), fugitive dust shall not be visible crossing the boundary or property line of a source. Observances of visible emissions crossing property lines may be refuted by factual data expressed in 326 IAC 6-4-2(1), (2) or (3).

**State Rule Applicability - Individual Facilities**

**326 IAC 2-1-3.4 (New Source Toxics Control)**

Pursuant to 326 IAC 2-1-3.4 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). All facilities at the source were constructed before the rule promulgation date of July 27, 1997, and therefore, are not subject to the requirements of 326 IAC 2-1-3.4.

**326 IAC 6-3-2 (Process Operations)**

- (a) The three (3) spray gun emission units (EU AA, BB and CC) are subject to 326 IAC 6-3-2 (Particulate Emission Limitations). Pursuant to this rule, the allowable particulate matter (PM) overspray from each spray gun are limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The source will comply with the requirements under 326 IAC 6-3-2 by utilizing dry filters in a filter bank for controlling particulate matter emissions. This limit will also render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

- (b) The three (3) circular saws are subject to 326 IAC 6-3-2 (Particulate Emission Limitations). Pursuant to this rule, the allowable particulate matter (PM) emissions from the operation of each saw are limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Based on a process weight rate of 229 pounds per hour for each saw:

$$E = 4.10 (229/2000)^{0.67} \\ E = 0.96 \text{ pounds per hour} = 4.2 \text{ tons per year}$$

The potential to emit for each saw is 1.59 tons per year, since the PTE is less than the allowable no control device is required for these facilities and the source will comply with the requirements under 326 IAC 6-3-2 without utilizing any control device. This limit will also render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

#### 326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

The gel coat spray gun (EU AA) and the two (2) resin chop spray guns (EU BB and CC) are subject to the provisions of 326 IAC 8-1-6. This rule requires all facilities constructed after January 1, 1980, which have potential VOC emission rates of 25 or more tons per year, and which are not otherwise regulated by other provisions of 326 IAC 8, to reduce VOC emissions using Best Available Control Technology (BACT). Potential VOC emissions from the gel coat spray gun (EU AA) are 76.73 tons per year, based on the potential VOC usage of 219.4 tons per year and a 35% flash off for non vapor suppressed (NVS) gel coat. The potential VOC emissions from the two (2) resin chop spray guns (EU BB and CC) are 120.32 tons per year, based on the potential VOC usage of 925.85 tons per year and a 13% flash off for NVS resin used. Since the potential VOC emissions are greater than 25 tons per year for the facilities and no other article 8 rules apply, the requirements of 326 IAC 8-1-6 apply.

Front Line Manufacturing has submitted a BACT analysis as part of this permit application.

The options considered in the BACT analysis for the gel coat spray and resin chop spray guns (EU AA, BB, and CC) were limited to those that are technically feasible which are:

- (1) Use of resins for chop spray with lowered styrene content
- (2) Incineration using natural gas
- (3) Manufacture by use of Low-Pressure Molding Compound (LPMC)

A cost analysis was performed to determine the economic feasibility of the three options for the gel coat spray gun and resin chop spray guns VOC emissions. The first option has been tested by Front Line Manufacturing and has been approved by their customers. Therefore, this option was implemented during 1997 and the cost analysis for the other two options is based on potential VOC emissions of 197.04 tons per year.

The tables below show the results of the cost analysis.

(A) Capital Cost

Option	Base Price	Direct Cost	Indirect Cost	Total
RIM molding with LPMC:	(1)	8,000,000	260,600	8,260,000
Thermal Fume Oxidation:	(1)	1,200,000	100,000	1,300,000
Resin with lowered styrene content:	0	0	0	0

(1) Direct Cost includes Base Price.

(B) Annual Operating, Maintenance & Recovery Cost

Option	Direct Cost	Indirect Cost	Capital Recovery Cost	Total
RIM molding with LPMC:	(1)	(1)	(1)	2,009,796
Thermal Fume Oxidation:	249,660	(1)	316,312	565,972
Resin with lowered styrene content:	0	0	0	0

(1) Total Cost includes Direct, Indirect, and Capital Recovery Costs.

(C) Evaluation

Option	Potential Emissions (tons/yr)	Emissions Removed (tons/yr)	Control Efficiency (%)	\$/ton Removed
RIM molding with LPMC:	197.04	197.04	100	10,200
Thermal Fume Oxidation:	197.04	187.19	95	3,024
Resin with lowered styrene content:	247.17	50.13	20	0

Methodology:

Emissions removed = (potential emissions) \* (control efficiency)

\$/ton removed = total annual cost / emissions removed

The cost breakdown is as follows:

1. Capital Cost
  - a) Base price: purchase price, auxiliary equipment, instruments, controls, taxes and freight.

- b) Direct installation cost: foundations/supports, erection/handling, electrical, piping, insulation, painting, site preparation and building/facility.
  - c) Indirect installation cost: engineering, supervision, construction/filed expenses, construction fee, start up, performance test, model study and contingencies.
2. Annual Cost
- a) Direct operating cost: operating labor (operator, supervisor), labor and material maintenance, operating materials, utilities (electricity, gas).
  - b) Indirect operating cost: overhead, property tax, insurance, administration and capital recovery cost (for 10 years life of the system at 8% interest rate).

Because all options with the exception of reducing styrene content are technically infeasible or economically infeasible, the following work practices have been determined to be BACT for the gel coat spray and resin chop spray guns (EU AA, BB, and CC):

- a) training and instruction of operators in the most effective work practices for controlling placement of the gel coat including correctly positioning gun nozzles to maintain a 90° angle to the mold surface;
- b) proper testing of spray guns prior to daily use; and
- c) proper equipment clean-up and maintenance.
- d) all resins and gelcoats will be applied with air assisted airless spray applicators;
- e) spray cleaners will be cleaned with acetone;
- f) cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly;
- g) the spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air;
- h) the overspray shall be minimized by spraying as close as practical into the molds;
- i) the application equipment operators shall be instructed and trained on the methods and practices utilized to minimize the overspray emitted on the floor and into the air filters;
- j) the parts shall be placed underneath infrared lights to decrease the gelation time as required by ambient temperature conditions;
- k) all solvent sprayed during cleanup or color changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized; and
- l) storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.

The allowable VOC emissions from the gel coat spray gun (EU AA) will be 6.4 tons per month, based on 35% flash off for non vapor suppressed (NVS) gel coat.

The allowable VOC emissions from the resin chop spray guns (EU BB and CC) will be 10.03 tons per month, based on 13% flash off for non vapor suppressed (NVS) resin.

## **Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The dry filters controlling the gel spray gun and the two (2) chop spray gun operations have applicable compliance monitoring conditions as specified below:

- (a) Daily visible emissions notations of the dry filter stack exhausts (S/V ID A, B and C) shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

These monitoring conditions are necessary because the dry filters for overspray for the operations must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

## **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act.
- (b) See attached page 2 of 3 calculations for detailed air toxic calculations.

### **Conclusion**

The operation of this plastic composite manufacturer plant shall be subject to the conditions of the attached proposed Part 70 Permit No. T085-7186-00070.

**Table A**

**Description of facility:** Reinforced Plastics/Composites, Gel Spray Gun (EU AA)  
**Max Rating:** 142.6 pounds per hour  
**Construction Date:** 1995  
**Control Device (if any):** Dry Filters  
**Stack/Vent ID:** C

**Facility class:** Reinforced Plastics & Composites      **Description:** Dry Filters for overspray

<b>EMISSION LIMITATIONS</b>				
<b>Numerical Emission Limit:</b>	0.7 pounds PM per hour			
<b>Regulation/Citation:</b>	326 IAC 6-3-2			
<b>Compliance Demonstration:</b>				
<b>PERFORMANCE TESTING      NA</b>				
<b>Parameter/Pollutant to be Tested:</b>				
<b>Testing Method/Analysis:</b>				
<b>Testing Frequency/Schedule:</b>				
<b>Submittal of Test Results:</b>				
<b>COMPLIANCE MONITORING      NA</b>				
<b>Monitoring Description:</b>				
<b>Monitoring Method:</b>				
<b>Monitoring Regulation/Citation:</b>				
<b>Monitoring Frequency:</b>				
<b>RECORD KEEPING</b>				
<b>Parameter/Pollutant to be Recorded:</b>	Visibility observations			
<b>Recording Frequency:</b>	Daily			
<b>REPORTING REQUIREMENTS</b>				
<b>Information in Report:</b>				
<b>Reporting Frequency/Submittal:</b>	Upon OAM request			
<b>Additional Comments:</b>				



**Table B**

**Description of facility:** Reinforced Plastics/Composites, Chop Spray Gun (EU BB & CC)  
**Max Rating:** 356.5 pounds per hour  
**Construction Date:** 1995  
**Control Device (if any):** Dry Filters  
**Stack/Vent ID:** A, B

**Facility class:** Reinforced Plastics & Composites      **Description:** Dry Filters for overspray

<b>EMISSION LIMITATIONS</b>				
<b>Numerical Emission Limit:</b>	2.05 pounds PM per hour, total for both stacks			
<b>Regulation/Citation:</b>	326 IAC 6-3-2			
<b>Compliance Demonstration:</b>				
<b>PERFORMANCE TESTING      NA</b>				
<b>Parameter/Pollutant to be Tested:</b>				
<b>Testing Method/Analysis:</b>				
<b>Testing Frequency/Schedule:</b>				
<b>Submittal of Test Results:</b>				
<b>COMPLIANCE MONITORING      NA</b>				
<b>Monitoring Description:</b>				
<b>Monitoring Method:</b>				
<b>Monitoring Regulation/Citation:</b>				
<b>Monitoring Frequency:</b>				
<b>RECORD KEEPING</b>				
<b>Parameter/Pollutant to be Recorded:</b>	Visibility observations			
<b>Recording Frequency:</b>	Daily			
<b>REPORTING REQUIREMENTS</b>				
<b>Information in Report:</b>				
<b>Reporting Frequency/Submittal:</b>	Upon OAM request			
<b>Additional Comments:</b>				

## Indiana Department of Environmental Management Office of Air Management

### Addendum to the Technical Support Document (TSD) for a Part 70 Operating Permit and Enhanced New Source Review (ENSR)

#### Source Background and Description

<b>Source Name:</b>	<b>Front Line Manufacturing, Inc.</b>
<b>Source Location:</b>	<b>306 School Street, Leesburg, IN 46538</b>
<b>County:</b>	<b>Kosciusko</b>
<b>SIC Code:</b>	<b>3714</b>
<b>Operation Permit No.:</b>	<b>T085-7186-00070</b>
<b>Permit Reviewer:</b>	<b>Richard A. Moore Jr./EVP</b>

On December 7, 1997 the Office of Air Management (OAM) had a notice published in the Times Union, Warsaw, Indiana, stating that Front Line Manufacturing, Inc. had applied for a Part 70 Operating Permit and Enhanced New Source Review for their plastic composite manufacturing plant. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On December 29, 1997, ISES (as a consultant for Front Line Manufacturing, Inc.), submitted comments on the proposed permit. The summary of the comments and corresponding responses is as follows:

#### **Comment #1:**

On page 28 of 37, Section D.1.1 (j) ***the parts shall be placed underneath infrared lights to decrease the gelation time as required by ambient temperature conditions***; the applicant has requested that this condition be deleted because the plant is not set up to accept gel-coated parts that have been processed in this manner. Furthermore, the applicant states that speeding up the gelation process at this source will result in "pre-release" of the parts from the molds and that in turn this will lead to de-lamination of these parts, rendering them unsuitable for sale to their customers.

#### **Response #1:**

OAM has deleted this condition and renumber the remaining conditions of D.1.1 because the condition was intended to satisfy BACT requirements which were determined in the TSD to be technically feasible work practices. Since this condition is technically infeasible at this source, it has been removed. This TSD addendum also corrects the original TSD.

Upon further review, the OAM has decided to make the following revisions to the TSD (**bolded** language has been added, the language with a line through it has been deleted). The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

1. On page 2 of 12 of the Technical Support Document in the Potential Emissions Section, the VOC and Dimethyl Phthalate emission levels were changed to reflect updated emission factors from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998.

Pollutant	Potential Emissions (tons/year)
PM	greater than 100 and less than 250
PM-10	greater than 100 and less than 250
SO <sub>2</sub>	less than 100
VOC	greater than <del>100</del> and <del>less than 250</del>
CO	less than 100
NO <sub>x</sub>	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Styrene	greater than 10
Methyl Ethyl Ketone	less than 10
Toluene	less than 10
Dimethyl Phthalate	<del>less</del> <b>greater</b> than 10
TOTAL	greater than 25

2. On page 6 of 12 of the Technical Support Document under 326 IAC 8-1-6 (New Facilities, General Reduction Requirements), the following language was added to reflect the usage of new emission factors for the fiberglass industries.

**Due to the usage of the new emission factors for the fiberglass industry (emission factors obtained from "CFA Emission Models for the Reinforced Plastics Industries", Composites Fabricators Association, Feb. 28, 1998), the calculated potential VOC emissions for Gel and Chop Spray guns were increased from 197.04 to 310.95 tons per year. The source has committed to limit potential to emit VOC from Gel and Chop spray guns to 197.04 tons per year, as public noticed on December 7, 1997. Based on the new flash off factors of 14.7% for Gel coatings, the usage of EU AA [which includes the use of a Gel coating (containing 33% Styrene), a Mold Release agent, and a Catalyst] is limited to 648.76 tons per year. Based on the new flash off factors of 7.0% for Resin coatings, the usage of EU BB and CC [which includes the use of a Resin coating (containing 32% Styrene) and a Catalyst] is limited to 2623.42 tons per year.**

3. On page 4 of 12 of the Technical Support Document under 326 IAC 2-2 (Prevention of Significant Deterioration, PSD) and 40 CFR 52.21, the language was changed to reflect the sources VOC limitation of 197.30 tons per year.

326 IAC 2-2 (Prevention of Significant Deterioration, PSD) and 40 CFR 52.21

~~This source is not subject to the requirements of 326 IAC 2-2 (PSD), because the source is not one of the 28 listed source categories and the source's potential emissions for all regulated pollutants are less than 250 tons per year.~~

**Total source-wide VOC emissions shall be limited to 197.30 tons per year and the source is not one of the 28 listed source categories, therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) is not applicable.**

4. On page 9 of 12 of the Technical Support Document under Compliance Requirements, the language was changed to reflect Compliance Monitoring revisions.

The dry filters controlling the gel spray gun and the two (2) chop spray gun operations have applicable compliance monitoring conditions as specified below:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, ~~daily~~ **weekly** observations shall be made of the overspray **from the surface coating booth stack S/V ID C** while one or more of the booths are in operation **and exhausting to the atmosphere**. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.  
~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when ~~an overspray emission, evidence of overspray emission, or other abnormal emission is observed~~ **a noticeable change in overspray emission, or evidence of overspray emission is observed**. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

5. On page 11 and 13 of 12 of the Technical Support Document under Table A and B, language was added to reflect the emission limitations, record keeping, and reporting requirements needed for VOC emissions.

Upon further review, the OAM has decided to make the following revisions to the permit (**bolded** language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

1. On the first page of the permit, the Assistant Commissioner's name was changed to Janet G. McCale.
2. Section A (Source Summary) has been revised to clarify that the description of the source in conditions A.1 through A.3 is informational only and does not constitute separately enforceable conditions. The descriptive information in other permit conditions is enforceable.

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and presented in the permit application. **The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.**

3. Condition B.1(b) (Permit No Defense) has been revised to reference the permit shield condition that is found later in Section B.
  - (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, **as set out in this permit in the Section B condition entitled "Permit Shield."**
4. Condition B.8 (c) (Duty to Supplement Information) has been revised to clarify how the Permittee may assert a claim that records are confidential information:
  - (c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required to be kept by this permit. **If the Permittee wishes to assert a claim of confidentiality over any of the furnished records,** For information claimed to be confidential, the Permittee ~~must~~ **shall** furnish such records to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, **to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records,** then the Permittee ~~must~~ **shall** furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.
5. The last two lines after Condition B.8(c) have been deleted.
6. Part (a) of Condition B.11, Annual Compliance Certification, has been revised to read as follows (changes in bold or strikeout):

**B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]**

---

  - (a) The Permittee shall annually ~~certify that the source has complied~~ **submit a compliance certification report which addresses the status of the source's compliance** with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:
7. Section B.11 (c) (Annual Compliance Certification) has been revised to match changes to the federal Part 70 rules. The language in (c)(3) has been revised since it appears to be a clarification rather than a change in the requirement. The language in (c)(5) has been added to clarify the treatment of insignificant activities. OAM is revising the nonrule policy document Air-007 NPD to provide more guidance regarding the annual compliance certification requirements for sources with Title V permits:

- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was **based on** continuous or intermittent **data**;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); ~~and~~
  - (5) Any insignificant activity that has been added without a permit revision; and**
  - ~~(5)~~ **(6)** Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The ~~notification which shall be submitted~~ **submittal** by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

8. Condition B.12 (a) (Preventive Maintenance Plan) has been revised to more closely match the language in 326 IAC 1-6-3. A provision allowing a one time extension of the time within which the Permittee must prepare and maintain the PMP has also been added to (a).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

- 
- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each **facility**:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing ~~emission units and associated~~ emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

**If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:**

**Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015**

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
  - (c) PMP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.
9. Condition B.14 (Permit Shield) condition has been revised to clarify how the permit shield affects applicable requirements from previous permits and how the permit shield affects determinations that a specific requirement is not applicable to the source.

B.14 Permit Shield [326 IAC 2-7-15]

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**(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.**

**(a) (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.**

Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided ~~that either of the following:~~

- (1) The applicable requirements are included and specifically identified in this permit; **or**
  - (2) ~~IDEM, OAM, in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof. The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.~~
- (b) (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.**
- (c) (d) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order. No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.**

~~(d)~~ **(e)** Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
- (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

~~(e)~~ **(f)** This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

~~(f)~~ **(g)** This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]

~~(g)~~ **(h)** This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

Condition B.16 (Deviations from Permit Requirements and Conditions) has been revised to add the deviation terminology that had been contained in Section C, in the General Reporting Requirements condition:

**B.16** Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

**(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:**

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or**
- (2) An emergency as defined in 326 IAC 2-7-1(12); or**
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.**



- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.**

**A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.**

- ~~(b)~~ **(c)** Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. **The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- ~~(e)~~ **(d)** Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.
10. Condition B.18 (a) (Permit Renewal) has been changed as follows to clarify the treatment of certain trivial activities:
- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) **and 326 IAC 2-7-1(40).**
11. Conditions B.19 (Administrative Permit Amendment), B.20 (Minor Permit Modification) , and B.21 (Significant Permit Modification) have all been combined into one condition numbered B.19 (Permit Amendment or Modification). Conditions B.20 and B.21 have been deleted. The new Condition B.19 ( Permit Amendment or Modification) will read as follows:
- B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**
- 
- (a) **The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.**
- (b) **Any application requesting an amendment or modification of this permit shall be submitted to:**
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015**
- Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.**
- (c) **The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]**
12. Condition B.26 (now renumbered B.24) (Inspection and Entry) has been revised to remove the requirement for an IDEM identification card, which other agencies do not have.

**B.26 Inspection and Entry [326 IAC 2-7-6(2)]**

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Upon presentation of ~~IDEM~~ **proper** identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.  
[326 IAC 2-7-6(6)]

- (1) **The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]**
- (2) **The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]**

13. Condition B.27 (b)(now re-numbered B.25) (Transfer of Ownership or Operation) has been revised to clarify that this notification does not require a certification by a responsible official.

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. **The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

14. Condition B.28 (now renumbered B.26) (Annual Fee Payment) has been revised to clarify the Permittee's responsibility for the timely payment of annual fees.

**B.28 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

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- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. ~~or in a time period consistent with the fee schedule established in 326 IAC 2-7-19.~~ **If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.**
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) ~~If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date,~~ The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. ~~The applicable fee is due April 1 of each year.~~
15. Condition C.1(b) is revised to change the overall source to an amount "less than" the applicable limit.
- ~~(b) Any change or modification which may increase potential emissions to 250 tons per twelve (12) consecutive month period, from the equipment covered in this permit, shall require a PSD permit pursuant to 326 IAC 2-2, before such change may occur. The total source potential to emit VOC is limited to less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.~~
16. Condition C.2 (Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour) is a new condition that reads as follows to address the PM emission limitation for facilities below 100 pounds per hour.

**C.2**

**Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]**

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- Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.**
17. The statement "This condition is not federally enforceable." has been removed from Condition C.2 (now renumbered C.3), Opacity, of the Part 70 Operating Permit.
18. The last sentence of Condition C.2 (renumbered C.3), has been deleted and the condition has been revised to reflect current rule language. The condition has been changed to:
- C.23 Opacity [326 IAC 5-1]**
- 
- Pursuant to 326 IAC 5-1-2 (~~Visible Emissions~~ **Opacity** Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), ~~visible emissions opacity~~ shall meet the following, unless otherwise stated in this permit:

- (a) ~~Visible emissions~~ **Opacity** shall not exceed an average of forty percent (40%) ~~opacity~~ in ~~twenty-four (24) consecutive readings, any one (1) six (6) minute averaging period~~ as determined in 326 IAC 5-1-4.
- (b) ~~Visible emissions~~ **Opacity** shall not exceed sixty percent (60%) ~~opacity~~ for more than a cumulative total of fifteen (15) minutes (sixty (60) readings **as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor**) in a six (6) hour period.

~~This condition is not federally enforceable.~~

19. Condition C.3 (now renumbered C.4), Open Burning, of the Part 70 Operating Permit, has been revised as follows (changes in bold or strikeout):

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. ~~This condition is not federally enforceable.~~ **326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.**

20. The statement "This condition is not federally enforceable." has been removed from Condition C.4 (now renumbered C.5), Incineration, of the Part 70 Operating Permit.

21. Condition C.5 (now renumbered C.6), Fugitive Dust Emissions, of the Part 70 Operating Permit, has been revised as follows (changes in bold or strikeout):

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). ~~Rule 326 IAC 6-4-2(4) regarding visible dust is not federally enforceable.~~ **326 IAC 6-4-2(4) is not federally enforceable.**

22. Condition C.6 (now renumbered C.7) (Operation of Equipment) has been revised to clarify the requirement.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit **and used to comply with an applicable requirement** shall be operated at all times that the emission unit vented to the control equipment is in operation. ~~as described in Section D of this permit.~~

23. Condition C.7 (now renumbered C.8) (Stack Height) has been revised to clarify the requirement.

C.7 Stack Height [326 IAC 1-7]

- (a) The Permittee shall comply with the **applicable** provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.
- (b) ~~Any change in an applicable stack shall require prior approval from IDEM, OAM.~~

24. Conditions C.8 (Asbestos Abatement Projects-Accreditation) and C.13 (Asbestos Abatement

Projects) have been combined into one new condition C.9 (Asbestos Abatement Projects).

**C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]**

- 
- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) **Indiana Accredited Asbestos Inspector**  
**The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.**

25. Condition C.9 (now re-numbered C.10) (Performance Testing) is revised to correct a rule citation, add a notification requirement, and clarify that any submittal under this condition does not require a certification by a responsible official:

C.9 Performance Testing ~~[326 IAC 3-2-1]~~ **[326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC ~~3-2-1~~ **3-6** (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days ~~before~~ **prior to** the intended test date. **The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.**

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

**The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

26. Condition C.10 (now re-numbered C.11) (Compliance Schedule) has been revised to more closely match the rule language, and the punctuation in Condition C.10 has been corrected.

C.10 Compliance Schedule ~~[326 IAC 2-7-6(3)]~~

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The Permittee:

- (a) **Has certified that all facilities at this source are in compliance with all applicable requirements; and** ~~Will continue to comply with such requirements that become effective during the term of this permit; and~~
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) **Will comply with such applicable requirements that become effective during the term of this permit.** ~~Has certified that all facilities at this source are in compliance with all applicable requirements.~~

27. Condition C.11 (now re-numbered C.12) (Compliance Monitoring) has been revised to allow a one time extension of the time to install and initiate any required monitoring.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

---

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee **may extend compliance schedule an additional ninety (90) days provided the Permittee** shall notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, **prior to the end of the initial ninety (90) day compliance schedule** ~~no more than ninety (90) days after receipt of this permit, with full justification of the reasons for the inability to meet this date. and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.~~

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

28. Condition C.12 (now re-numbered as C.13) (Monitoring Methods) has been revised to clarify the requirement.

C.12 Monitoring Methods [326 IAC 3]

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Any monitoring or testing performed to meet the **applicable** requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

29. Condition C.14 (Emergency Reduction Plans) has been revised to clarify that the plan does not require a certification by a responsible official.

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

**The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. ~~If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM, shall supply such plan.~~
  - (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
  - (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
  - (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]
30. Condition C.15 (Risk Management Plan) has been revised to more closely match the rule language of 40 CFR 68 and clarify that any submittal under this condition requires a certification by a responsible official.
- C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- 
- If a regulated substance, subject to 40 CFR 68, is present **in a process** in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:
- (a) Submit:
    - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
    - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
    - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
  - (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.
- All documents submitted pursuant to this condition shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**
31. Condition C.16 (Compliance Monitoring Plan-Failure to Take Response Steps) the following rule cites were changed and added to the title, as follows:
- C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(3)]  
**[326 IAC 2-7-6] [326 IAC 1-6]**
- 
32. Condition C.17 is revised to add the following rule cites to the title, and clarify that any submittal under this condition does not require a certification by a responsible official.



C.17 Actions Related to Noncompliance Demonstrated by a Stack Test **[326 IAC 2-7-5]**

**[326 IAC 2-7-6]**

- 
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

**The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

33. Condition C.18(a)(1) and (2) of the Part 70 Operating Permit, has been revised to change the work "contain" to "Indicate".
34. Condition C.18 (a) has been revised to clarify the certification requirement for the emission statement.

C.18 Emission Statement ~~[326 IAC 2-7-5(3)(C)(iii)]~~~~[326 IAC 2-7-5(7)]~~~~[326 IAC 2-7-19(c)]~~**[326 IAC 2-6]**

- 
- (a) The Permittee shall submit ~~an certified~~, annual emission statement **certified pursuant to the requirements of 326 IAC 2-6**, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

35. Condition C.20 (General Record Keeping) is revised to add the following rule citation and to change the requirements for keeping records, making records available, and furnishing records, to more closely match the rule language as follows:

C.20 General Record Keeping Requirements ~~[326 IAC 2-7-5(3)(B)]~~**[326 IAC 2-7-6]**

- 
- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location **for a minimum of three (3) years** and available **upon the request** ~~within one (1) hour upon verbal request of an IDEM, OAM, representative, for a minimum of three (3) years. They~~ **The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request** ~~providing they are made available within thirty (30) days after written request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.~~

36. Condition C.21 (General Reporting Requirements) is revised to clarify what is included in the compliance monitoring reports and clarify that any submittal under this condition does not require a certification by a responsible official. The deviation terminology was moved to a Section B condition titled Deviations from Permit Requirements and Conditions.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the **compliance monitoring** requirements stated in this permit the source shall submit a Quarterly Compliance **Monitoring** Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations **as described in Section B- Deviations from Permit Requirements Conditions** must be clearly identified in such reports. ~~A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:~~
  - ~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~
  - ~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~
  - ~~(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation;~~
  - ~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.~~
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

**The documents submitted pursuant to this condition do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**

37. The facility description box in Section D is revised to include the rule citation:

<b>Facility Description [326 IAC 2-7-5(15)]</b>
---

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to the Best Available Control Technology (BACT) analysis presented as part of this application:

- (a) This facility shall use less than 725.45 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This usage limit is required to limit the sourcewide potential to emit of VOC to less than 197.30 tons per year to maintain compliance with 326 IAC 8-1-6 (Volatile Organic Compounds).
- (b) the following work practices have been determined to be BACT for the three (3) spray guns:
- (1)(a) training and instruction of operators in the most effective work practices for controlling placement of the gel coat including correctly positioning gun nozzles to maintain a 90° angle to the mold surface;
  - (2)(b) proper testing of spray guns prior to daily use;
  - (3)(c) proper equipment clean-up and maintenance;
  - (4)(d) all resins and gelcoats will be applied with air assisted airless spray applicators;
  - (5)(e) spray cleaners will be cleaned with acetone;
  - (6)(f) cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly;
  - (7)(g) the spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air;
  - (8)(h) the overspray shall be minimized by spraying as close as practical into the molds;
  - (9)(i) the application equipment operators shall be instructed and trained on the methods and practices utilized to minimize the overspray emitted on the floor and into the air filters;

- (10)(k) all solvent sprayed during cleanup or color changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized; and
- (11)(t) storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.
- (c) The allowable VOC emissions from the gel coat spray gun (EU AA) will be 6.4 tons per month, based on 35% flash off for non vapor suppressed (NVS) gel coat. The allowable VOC emissions from the resin chop spray guns (EU BB and CC) will be 10.03 tons per month, based on 13% flash off for non vapor suppressed (NVS) resin.

The BACT analysis and emissions calculations were based on:

- (1)(a) The gel coating used had a styrene concentration of 33% or less and a flash off of ~~35~~14.7%.
- (2)(b) The resin coating used had a styrene concentration of 35% or less and a flash off of ~~13~~7.0%
- (3)(e) The mold release coating had a VOC concentration of 98% or less.
- (4)(d) The catalyst used had a VOC concentration of 49% or less.
- (d) **Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for a each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.**
- (e) **Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA- approved form, emission factors shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent weight basis.**

- 38. The rule cited for Condition D.1.3 was changed to [326 IAC 2-7-5(13)]
- 39. Condition D.1.4 is revised to add the following rule cites to the title, and clarify that any submittal under this condition does not require a certification by a responsible official.

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

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~~Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the VOC limit specified in Condition D.1.1 and PM limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~ **The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 and the PM limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.**

40. Condition D.1.6 is revised to specify when the dry filters shall be operated.

D.1.6 Particulate Matter (PM)

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The dry filters used for PM control shall be in operation at all times when the three (3) spray guns (EU AA, BB or CC) are in operation **and exhausting to the atmosphere.**

41. Condition D.1.7 and D.1.8 are revised to change the frequency of inspections and overspray observations and to specify where and when the overspray shall be monitored.

D.1.7 Monitoring

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, ~~daily~~ **weekly** observations shall be made of the overspray **from the surface coating booth stack S/V ID C** while one or more of the booths are in operation **and exhausting to the atmosphere.** The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) ~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when ~~an overspray emission, evidence of overspray emission, or other abnormal emission is observed~~ **a noticeable change in overspray emission, or evidence of overspray emission is observed.** The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.8 Record Keeping Requirements

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- (a) To document compliance with Conditions D.1.1 and/or D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1 and/or D.1.2.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The volume weighted VOC content of the coatings used for each month;
  - (4) The cleanup solvent usage for each month;
  - (5) The total VOC usage for each month; and
  - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Conditions D.1.1 and/or D.1.2, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily and ~~weekly~~ **monthly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
42. Condition D.2.2 is revised to add a rule citation and to clarify the testing requirements.

**D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]**

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~~Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the VOC limit specified in Condition D.1.1 and PM limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~ **The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 and the PM limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.**

43. The reference to D.2.4 stated in Condition D.2.3 has been changed to **D.2.1**.
44. Condition D.3.2 is also revised to add a rule citation and to clarify the testing requirements.

**D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)]**

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~~Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the VOC limit specified in Condition D.1.1 and PM limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~ **The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.**

**If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 and the PM limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.**

45. The Certification Form is revised to clarify which forms require a certification.
46. The Emergency/Deviation Occurrence Reporting Form is revised to eliminate the certification requirement and to list a new fax number.
47. The Quarterly Compliance Report is renamed the Quarterly Compliance Monitoring Report and is revised to make it easier to understand and use.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Front Line Manufacturing, Inc.  
Source Address: 306 School Street, Leesburg, IN 46538  
Mailing Address: P.O. Box 176, Leesburg, IN 46538  
Part 70 Permit No.: T085-7186-00070

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

☒ Annual Compliance Certification Letter

☐ ~~Emergency/Deviation Occurrence Reporting Form~~

☒ Test Result (specify) \_\_\_\_\_

☒ Report (specify) \_\_\_\_\_

☒ Notification (specify) \_\_\_\_\_

☒ Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Front Line Manufacturing, Inc.  
Source Address: 306 School Street, Leesburg, IN 46538  
Mailing Address: P.O. Box 176, Leesburg, IN 46538  
Part 70 Permit No.: T085-7186-00070

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2	
9 1.	This is an emergency as defined in 326 IAC 2-7-1(12)
C	The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C	The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
C	The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

**Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**Attach a signed certification to complete this report.**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Front Line Manufacturing, Inc.  
Source Address: 306 School Street, Leesburg, IN 46538  
Mailing Address: P.O. Box 176, Leesburg, IN 46538  
Part 70 Permit No.: T085-7186-00070  
Facility: Gel and Chop Spray guns EU AA, BB, CC  
Parameter: VOC Emissions  
Limit: This facility shall use less than 725.45 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This usage limit is required to limit the sourcewide potential to emit of VOC to less than 197.30 tons per year to maintain compliance with 326 IAC 8-1-6 (Volatile Organic Compounds).

YEAR: \_\_\_\_\_

Month	VOC Emissions (tons)	VOC Emissions (tons)	VOC Emissions (tons/year)
	This month	Previous 11 months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on:

Submitted by:  
Title / Position:  
Signature:  
Date:  
Phone:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Front Line Manufacturing, Inc.  
Source Address: 306 School Street, Leesburg, IN 46538  
Mailing Address: P.O. Box 176, Leesburg, IN 46538  
Part 70 Permit No.: T085-7186-00070  
Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

This report is an affirmation that the source has met all the **compliance monitoring** requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the **compliance monitoring** requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify ~~zero in the column marked "No Deviations"~~ in the box marked **"No deviations occurred this reporting period"**.

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD: LIST EACH COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:**

<b>Compliance Monitoring Requirement</b> (e.g. Permit Condition D.1.3)	<b>Number of</b> <b>Deviations</b>	<b>Date of each</b> <b>Deviations</b>	<b>No</b> <b>Deviations</b>

Form Completed By: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Table A**

**Description of facility:** Reinforced Plastics/Composites, Gel Spray Gun (EU AA)  
**Max Rating:** 142.6 pounds per hour  
**Construction Date:** 1995  
**Control Device (if any):** Dry Filters  
**Stack/Vent ID:** C

**Facility class:** Reinforced Plastics & Composites      **Description:** Dry Filters for overspray

<b>EMISSION LIMITATIONS</b>				
<b>Numerical Emission Limit:</b>	0.7 pounds PM per hour	<b>84.13 tons per year</b>		
<b>Regulation/Citation:</b>	326 IAC 6-3-2	<b>326 IAC 2-2</b>		
<b>Compliance Demonstration:</b>				
<b>PERFORMANCE TESTING      NA</b>				
<b>Parameter/Pollutant to be Tested:</b>				
<b>Testing Method/Analysis:</b>				
<b>Testing Frequency/Schedule:</b>				
<b>Submittal of Test Results:</b>				
<b>COMPLIANCE MONITORING      NA</b>				
<b>Monitoring Description:</b>				
<b>Monitoring Method:</b>				
<b>Monitoring Regulation/Citation:</b>				
<b>Monitoring Frequency:</b>				
<b>RECORD KEEPING</b>				
<b>Parameter/Pollutant to be Recorded:</b>	Visibility observations	<b>VOC</b>		
<b>Recording Frequency:</b>	Daily	<b>Daily</b>		
<b>REPORTING REQUIREMENTS</b>				
<b>Information in Report:</b>		<b>VOC usage</b>		
<b>Reporting Frequency/Submittal:</b>	Upon OAM request	<b>monthly/quarterly</b>		
<b>Additional Comments:</b>				

**Table B**

**Description of facility:** Reinforced Plastics/Composites, Chop Spray Gun (EU BB & CC)  
**Max Rating:** 356.5 pounds per hour  
**Construction Date:** 1995  
**Control Device (if any):** Dry Filters  
**Stack/Vent ID:** A, B

**Facility class:** Reinforced Plastics & Composites      **Description:** Dry Filters for overspray

<b>EMISSION LIMITATIONS</b>				
<b>Numerical Emission Limit:</b>	2.05 pounds PM per hour, total for both stacks	<b>164.62 tons per year, total for both stacks</b>		
<b>Regulation/Citation:</b>	326 IAC 6-3-2	<b>326 IAC 2-2</b>		
<b>Compliance Demonstration:</b>				
<b>PERFORMANCE TESTING      NA</b>				
<b>Parameter/Pollutant to be Tested:</b>				
<b>Testing Method/Analysis:</b>				
<b>Testing Frequency/Schedule:</b>				
<b>Submittal of Test Results:</b>				
<b>COMPLIANCE MONITORING      NA</b>				
<b>Monitoring Description:</b>				
<b>Monitoring Method:</b>				
<b>Monitoring Regulation/Citation:</b>				
<b>Monitoring Frequency:</b>				
<b>RECORD KEEPING</b>				
<b>Parameter/Pollutant to be Recorded:</b>	Visibility observations	<b>VOC</b>		
<b>Recording Frequency:</b>	Daily	<b>Daily</b>		
<b>REPORTING REQUIREMENTS</b>				
<b>Information in Report:</b>		<b>VOC usage</b>		
<b>Reporting Frequency/Submittal:</b>	Upon OAM request	<b>monthly/quarterly</b>		
<b>Additional Comments:</b>				

**Appendix A: Emission Calculations**  
**Form DD: Reinforced Plastics and Composites**  
**Fiberglass Processes**

**Company Name: Front Line Manufacturing, Inc.**  
**Address City IN Zip: 306 School Street, Leesburg, IN 46538**  
**OP: T085-7186-00070**  
**Reviewer: Richard A. Moore Jr./EVP**  
**Date: 10/27/97**

Material (as applied)	booth	Density (lb/gal)	Weight % Volatiles	Max. Gallons per hour	Pound VOC per hour	Pounds VOC per day	Tons of VOC per Year	PM tons per year	Emission Factor (Flash Off)	Transfer Efficiency
<b>State Potential Emissions (uncontrolled):</b>										
Mold Release	AA	7.24	0.98	0.064	0.45	10.90	1.99	0.00	1.00	1.00
Gel Coat (Polydyne)	AA	10.25	0.33	13.88	20.91	501.88	91.59	41.75	0.15	0.90
Catalyst (Witco)	AA	9.26	0.49	0.58	5.40	63.49	11.59	1.21	1.00	0.90
Resin	BB	8.90	0.35	32.97	20.54	493.01	89.97	83.55	0.07	0.90
Catalyst (Witco)	BB	9.26	0.49	0.65	2.95	70.78	12.92	1.34	1.00	0.90
Resin	CC	8.90	0.35	32.97	20.54	493.01	89.97	83.55	0.07	0.90
Catalyst (Witco)	CC	9.26	0.49	0.65	2.95	70.78	12.92	1.34	1.00	0.90
Total State Potential Emissions:					<b>73.75</b>	<b>1703.87</b>	<b>310.95</b>	<b>212.74</b>		
<b>Federal Potential Emissions (controlled):</b>										
<b>Total Federal Potential Emissions:</b>	Material Usage Limitation (%)	Control Efficiency		Controlled VOC Pounds per Hour	Controlled VOC Pounds per Day	Controlled VOC Tons per Year	Controlled PM tons per Year			
	<b>63.37%</b>	0.00%	<b>95.00%</b>	<b>27.01</b>	<b>1079.74</b>	<b>197.05</b>	<b>10.64</b>			

**NOTE:**

At a 3% annual usage limitation, Federal Potential VOC Emissions will be 24.0 ton/yr, thus the facility will not be subject to 326 IAC 8-1-6. (if applicable)

**METHODOLOGY**

Potential VOC Pounds per Hour = Density (lb/gal) \* Weight % Volatiles \* Gal per Hour (gal/hr) \* Emission factor

Potential VOC Pounds per Day = Density (lb/gal) \* Weight % Volatiles \* Gal per Hour (gal/hr) \* (24 hrs / 1 day) \* Emission factor

Potential VOC Tons per Year = Density (lb/gal) \* Weight % Volatiles \* Gal per Hour (gal/hr) \* (8760 hr/yr) \* (1 ton / 2000 lbs) \* Emission factor

Particulate Potential Tons per Year = (gal/hr) \* (lbs/gal) \* (1 - Weight % Volatiles) \* (1 - Transfer efficiency) \* (8760 hr/yr) \* (1 ton / 2000 lbs)

Total = Sum of all materials and solvents used

Emission Factor for Marble Casting NVS is 3%, VS is 2%

Emission Factor for Hand and Spray Layup of gelcoat NVS is 35%, VS is 25%

Emission Factors are from AP42, Fifth Edition (January 1995), Table 4.4-2

NVS = Non-vapor suppressed resin

VS = Vapor suppressed resin

**Appendix A: Emission Calculations**  
**Form DD: Reinforced Plastics and Composites**  
**Fiberglass Processes**

**Company Name:** Front Line Manufacturing, Inc.  
**Address City IN Zip:** 306 School Street, Leesburg, IN 46538  
**OP:** T085-7186-00070  
**Reviewer:** Richard A. Moore Jr./EVP  
**Date:** 10/27/97

Material (as applied)	booth	Potential Tons per Year	Tons per year Styrene	Tons per year MEK	Tons per year Toluene	Tons per year Dimethyl Phthalate	Tons per year Mineral Spirits	Tons per year IPA	Tons per year other VOCs	Total VOC per Year	Total HAPs
Mold Release	AA	2.03			1.79		0.10	0.10		1.99	1.79
											0.00
Gel Coat (Polydyne)	AA	277.55	91.59							91.59	91.59
Catalyst (Witco)	AA	23.65		0.47		11.12				11.59	11.59
											0.00
Resin	BB	257.06	82.26						7.71	89.97	82.26
Catalyst (Witco)	BB	26.37		0.53		12.39				12.92	12.92
											0.00
Resin	CC	257.06	82.26						7.71	89.97	82.26
Catalyst (Witco)	CC	26.37		0.53		12.39				12.92	12.92
Total, TPY		870.09	256.11	1.53	1.79	35.90	0.10	0.10		310.95	295.33



**Appendix A: Emission Calculations**  
**Natural Gas Combustion**  
**MM Btu/hr 0.3 - < 10**

**Company Name:** Front Line Manufacturing, Inc.  
**Address City IN Zip:** 306 School Street, Leesburg, IN 46538  
**OP:** T085-7186-00070  
**Reviewer:** Richard A. Moore Jr./EVP  
**Date:** 10/28/97

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

9.9

86.7

	Pollutant					
Emission Factor in lb/MMCF	PM 11.9	PM10 11.9	SO2 0.6	NOx 100.0	VOC 5.8	CO 21.0
Potential Emission in tons/yr	0.52	0.52	0.03	4.34	0.25	0.91

Methodology:

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx burner = 15, Flue Gas Recirculation = ND.

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton